

Jeff Silvestri, Esq. (NSBN 5779)  
Ryan J. Works, Esq. (NSBN 9224)  
Tara U. Teegarden, Esq. (NSBN 15344)  
McDONALD CARANO LLP  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
Telephone: (702) 873-4100  
[jsilvestri@mcdonaldcarano.com](mailto:jsilvestri@mcdonaldcarano.com)  
[rworks@mcdonaldcarano.com](mailto:rworks@mcdonaldcarano.com)  
[tteegarden@mcdonaldcarano.com](mailto:tteegarden@mcdonaldcarano.com)

*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

INTERNATIONAL MARKETS LIVE,  
INC., a New York corporation dba  
iMARKETSLIVE,

Plaintiff,

vs.

MATTHEW THAYER,

Defendant.

Case No.: 2:22-cv-00077-RFB-DJA

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME**

**FIRST REQUEST**

Defendant Matthew Thayer (“Defendant”), by and through his attorneys, and Plaintiff International Markets Live, Inc. dba iMarketslive (“Plaintiff”), by and through its attorney, hereby submit this stipulation and order to continue the time needed to submit a stipulation to this Court on whether the Parties will need jurisdictional discovery or an evidentiary hearing pursuant to this Court’s Minute Order. *See* [ECF No. 33].

This Court requested that the parties provide this Court with a stipulation on or before June 13, 2022 regarding whether they will need jurisdictional discovery. The Parties have met and conferred several times to discuss whether they anticipate needing jurisdictional discovery and have exchanged limited information on the subject. After these several meet and confer sessions, it appears that Plaintiff needs an additional week to gather information regarding its jurisdictional arguments before the parties can appropriately inform this Court as to whether jurisdictional discovery will be needed.

The parties therefore request and stipulate that this Court give the parties until June 20, 2022 to provide this Court with the requested stipulation. The parties also to the request and stipulate that Defendant's deadline to file a response to the Amended Complaint be moved to June 28, 2022, Plaintiff's Opposition to any such responsive motion be moved to July 13, 2022, and Defendant's reply be moved to July 20, 2022.

The parties are working cooperatively to gather relevant information related to jurisdiction. The Parties jointly request that the Court enter the following Order approving that Stipulation. This Stipulation is entered into in good faith and not for the purposes of delay.

DATED this 17th day of June, 2022.

DATED this 17th day of June, 2022.

McDONALD CARANO LLP

LAW OFFICES OF P. STERLING KERR

By: /s/ Tara U. Teegarden

By: /s/ George E. Robinson


Jeff Silvestri, Esq. (NSBN 5779)  
Ryan J. Works, Esq. (NSBN 9224)  
Tara U. Teegarden, Esq. (NSBN 15344)  
2300 West Sahara Avenue, Suite 1200  
Las Vegas, Nevada 89102  
[jsilvestri@mcdonaldcarano.com](mailto:jsilvestri@mcdonaldcarano.com)  
[rworks@mcdonaldcarano.com](mailto:rworks@mcdonaldcarano.com)  
[tteegarden@mcdonaldcarano.com](mailto:tteegarden@mcdonaldcarano.com)

P. Sterling Kerr, Esq. (NSBN. 3978)  
George E. Robinson, Esq. (NSBN 9667)  
2900 W. Horizon Ridge Parkway  
Henderson, Nevada 89052  
[sterling@sterlingkerrlaw.com](mailto:sterling@sterlingkerrlaw.com)  
[george@sterlingkerrlaw.com](mailto:george@sterlingkerrlaw.com)

*Attorneys for Defendant*

*Attorneys for Plaintiff*

**IT IS SO ORDERED.**

  
**RICHARD E. BOULWARE, II**  
**United States District Court**

June 20, 2022

DATED